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Attorneys for Defendant
NATIONWIDE INSURANCE COMPANY OF AMERICA

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSEPH RAMON, individually

Plaintiff,

v

NATIONWIDE INSURANCE COMPANY
OF AMERICA; DOES 1 through 20; ROE
BUSINESS ENTITIES 1 through 20,
inclusive jointly and severally,

Defendants.

Case No.: 2:22-cv-01618-GMN-EJY

**STIPULATION AND [PROPOSED]
ORDER TO DISMISS ACTION WITH
PREJUDICE AND WITHDRAWAL OF
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT [ECF NO. 16]**

**TO THE U.S. DISTRICT COURT FOR THE DISTRICT OF NEVADA, ALL
PARTIES, AND THEIR ATTORNEYS OF RECORD:**

Plaintiff Joseph Ramon ("Plaintiff") and Defendant Nationwide Insurance

Company of America (“NICOA”), by and through their attorneys of record, having entered into a written confidential settlement agreement, and pursuant to *Federal Rules of Civil Procedure* 41(a), hereby stipulate and agree to dismiss the above-referenced action in its entirety, with prejudice.

Defendant also requests that its Motion for Summary Judgment filed on March 17, 2023 [ECF Document No. 16] be withdrawn and that no ruling or order be issued in relation to it.

The parties have agreed that each side shall bear its own costs and fees.

Dated: July 19, 2023

RICHARD HARRIS LAW FIRM

By: /s/ Samantha A. Harris
Samantha A. Harris
Attorneys for Plaintiff

Dated: July 19, 2023

HINES HAMPTON PELANDA, LLP

By: /s/ Nicole M. Hampton
Nicole M. Hampton
Attorneys for Defendant

ATTESTATION OF CONCURRENCE IN FILING

I hereby attest and certify that on July 19, 2023, I received concurrence from Plaintiff’s counsel, Samantha A. Harris, to file this document with his electronic signature attached.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 19, 2023.

/s/ Nicole M. Hampton
Nicole M. Hampton

ORDER

Based on the parties' stipulation herein, and good cause appearing,

IT IS HEREBY ORDERED that this action shall be and hereby is dismissed in its entirety, with prejudice, with each side to bear its own fees and costs, and Defendant's Motion for Summary Judgment [ECF Document No. 16] is hereby WITHDRAWN.

The Clerk of Court is directed to CLOSE THIS CASE.



U.S. District Judge Gloria M. Navarro

Dated: July 19, 2023